

<b>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY</b>	
<b>Caption in Compliance with D.N.J. LBR 9004-1(b)</b>	
<b>OTTERBOURG P.C.</b> Melanie L. Cyganowski, Esq. Adam C. Silverstein, Esq. Jennifer S. Feeney, Esq. 230 Park Avenue New York, NY 10169 Tel: (212) 661-9100 Fax: (212) 682-6104 Email: <a href="mailto:mcyganowski@otterbourg.com">mcyganowski@otterbourg.com</a> <a href="mailto:asilverstein@otterbourg.com">asilverstein@otterbourg.com</a> <a href="mailto:jfeeney@otterbourg.com">jfeeney@otterbourg.com</a>  <i>Co-Counsel for the Official Committee of Talc Claimants</i>	
In re:  LTL MANAGEMENT LLC, <sup>1</sup>  Debtor.	Chapter 11  Case No.: 21-30589 (MBK)  Hon. Michael B. Kaplan

**DECLARATION OF MELANIE L. CYGANOWSKI  
REGARDING OTTERBOURG P.C. RATE INCREASE**

MELANIE L. CYGANOWSKI, pursuant to 28 U.S.C. § 1746, declares, under penalty of perjury, as follows:

1. I am a member of the firm of Otterbourg P.C. (“Otterbourg”), counsel to the Official Committee of Unsecured Creditors in the above-captioned chapter 11 case. I submit this declaration to provide disclosure of Otterbourg’s rate increases.

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<sup>1</sup> The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

2. On November 20, 2021, the Official Committee of Talc Claimants filed an *Application for Retention of Professional Otterbourg P.C., Effective as of November 12, 2021* (the “Application”) [Dkt. No. 503].

3. On December 16, 2021, the Court entered an *Order Authorizing Retention and Employment of Otterbourg P.C. as Co-Counsel to the Official Committee of Talc Claimants Effective as of November 12, 2021* [Dkt. No. 855].

4. On December 23, 2021, the Office of the United States Trustee for Region 3 filed a notice reconstituting the composition of the originally appointed creditors committee and appointing the Official Committee of Talc Claimants I (“TCC I”) and Official Committee of Talc Claimants II (“TCC II”). TCC I selected Otterbourg to serve as its co-counsel in this Case.

5. Effective April 12, 2022, the initial creditors’ committee appointed on December 16, 2021 for the Case (the “Initial Committee”) was reinstated and TCC I and TCC II were disbanded pursuant to the Court’s bench order issued at a hearing on March 8, 2022. Following the reinstatement of the Initial Committee, Otterbourg was asked to continue as its counsel in this Case.

6. In support of the Application, I disclosed Otterbourg’s standard billing rates in effect as of October 1, 2021, which were based on the various professionals’ and paraprofessionals’ levels of experience. I also disclosed that Otterbourg’s hourly billing rates are subject to periodic review and adjustment, and that Otterbourg typically revises the hourly billing rates of professionals and paraprofessionals on October 1<sup>st</sup> of each year [Dkt. No. 503-1].

7. Pursuant to Otterbourg’s typical practice, effective as of October 1, 2022, the standard hourly billing rates charged by Otterbourg, for work of this nature both inside and

outside the bankruptcy context, for professionals and paraprofessionals have increased as follows:

<b>Professional/Paraprofessional</b>	<b>Rate Per Hour</b>
Members/Of Counsel	\$710-\$1,620
Associates	\$325-\$905
Paralegals	\$380

8. The rate increases reflect economic and other conditions, and are subject to the same client-driven market forces, scrutiny, and accountability as Otterbourg's professionals in nonbankruptcy matters. These rates are comparable to the rates charged by professionals of similar experience and expertise for engagements of the scope and complexity similar to this chapter 11 case.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 30, 2022  
New York, New York

/s/ Melanie L. Cyganowski  
Melanie L. Cyganowski, Esq.